

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<p>PEARSON EDUCATION, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>CHEGG, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No.: 21-16866</p> <p style="text-align: center;"><b>ORDER OF THE SPECIAL DISCOVERY MASTER REGARDING CHIPRO, TRAINING COMMUNICATIONS, SUBMISSIONS OF QUESTIONS, AND INCIDENT REPORTS</b></p>
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**LINARES, J.**

This matter comes before the Special Master by way of the Parties' Joint Submission Outlining Logistics and Priority of Outstanding Discovery Disputes; and the Special Master having reviewed the Parties' previous submissions as to discovery disputes regarding CHIPRO, Training Communications, Submission of Questions and Incident Reports (ECF 106 at 5-9); and the Special Master having held Oral Argument on April 4, 2023 with respect to outstanding discovery disputes; and for the reasons set forth on the record during the aforementioned hearing;

**IT IS** on this 24th day of May, 2023,

**ORDERED** that Pearson's demands for documents pertaining to CHIPRO and Submission of Questions are hereby **DENIED AS MOOT**; and it is further

**ORDERED** that "CHIPRO" shall be added as a search term; and it is further

**ORDERED** that Pearson's demand for documents pertaining to Training Communications is hereby **GRANTED IN PART AND DENIED IN PART**; and it is further

**ORDERED** that Chegg shall run appropriate searches across all custodians pertaining to this demand. Thereafter, Chegg shall provide Pearson with a "hit report." Based on that "hit report", the Parties will advise the Special Master if additional judicial intervention is necessary. In the event Chegg renews a burden or proportionality objection after review of the "hit report", said objection shall be as detailed as possible; and it is further

**ORDERED** that Pearson's request for discovery regarding Chegg's "Incident Reports" is **GRANTED IN PART AND DENIED IN PART**; and it is further

**ORDERED** that Chegg shall search for and produce any "Incident Report" discovery in its possession that pertains to Pearson content only; and it is further

**ORDERED** that Pearson's request for all emails regarding "Incident Reports" is **DENIED**; and it is further

**ORDERED** that all of the discovery required by this Order shall be produced no later than May 31, 2023.

**SO ORDERED.**

/s/ Jose L. Linares

Hon. Jose L. Linares, U.S.D.J. (Ret.)